

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**No. 2:18-md-02323-AB
MDL No. 2323**

No. 2:12-md-02323-AB
MDL No. 2323

Hon. Anita B. Brody

**DECLARATION OF SAMUEL ISSACHAROFF IN
RESPONSE TO COURT ORDER OF MARCH 28, 2018**

SAMUEL ISSACHAROFF declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, as follows:

1. I am seeking attorneys' fees for the work performed in this case by myself and Cynthia Estlund. As set forth in my prior declaration, my role in the case was primarily to help in assessing the settlement possibilities in the case and to take the lead oar in the various appeals of

this Court's orders. Professor Estlund worked a small number of hours on the issue of labor preemption that was argued to this Court prior to the settlement of the case.

2. Throughout my engagement in this litigation, I have worked at the request of Class Counsel, specifically, in collaboration with Chris Seeger and his team. I have not represented any individual Class Members and do not have a specific attorney-client relationship with any Class Member.

3. As a result, I have no individual client representation for any Class Member who has received a monetary award. I also have no individual client representation for any Class Member who has entered into an agreement to assign rights to any of the litigation funders listed in Question 3, or to any other litigation funder.

4. I have no personal relationship with any litigation funder in general, and no relationship to any litigation funder that has any claimed assignment from any class member.

5. I have played no role in promoting or facilitating access to litigation funders for any Class Member. To the best of my knowledge, I have no professional or personal, direct or indirect, relationship to any of the litigation funders used by Settlement Class Members. I have spoken on the topic of litigation funding at academic conferences and in judicial conferences, so it is possible that I may have shared a platform with someone from one of these entities. I have no recollection of having done so, and am certain that I did not do so in conjunction with any work in the NFL Concussion litigation.

RESPONSES TO REQUESTS FOR SPECIFIC INFORMATION

1. How many Settlement Class Members have you, your law firm or any attorney associated with your law firm:

A. Previously represented in this litigation and do not currently represent;

RESPONSE: 0

B. Currently represent in this litigation?

RESPONSE: 0

2. How many Settlement Class Members previously or currently represented by you, your law firm or any attorney associated with your law firm:

A. Have received a Monetary Award;

RESPONSE: 0

B. Have been informed that they are entitled to receive a Monetary Award;

RESPONSE: 0

C. Have applied for a Monetary Award;

RESPONSE: 0

D. That you have knowledge that they will be eligible to receive a Monetary Award?

RESPONSE: 0

3. How many Settlement Class Members previously or currently represented by you, your law firm or any attorney associated with your law firm have entered agreements to assign their rights to a Monetary Award (“Assignment(s)”) Assignment(s) include any agreements that are similar to the agreements attached to this Court’s Explanation and Order relating to the Third Party Funder Litigation (ECF No. 9531). Assignments further include, but are not limited to, any agreement with any of the following third party litigation funders:

- Atlas Legal Funding, LLC (to include the following related entities: Atlas Legal Funding I, L.P., and Atlas Legal Funding II, L.P.)
- Cambridge Capital Group, LLC (to include the following related entities: Cambridge Capital Group Equity Option Opportunities L.P., and Cambridge Capital Partners, L.P.)
- Cash4Cases, Inc.
- Global Financial Credit, LLC
- HMR Funding, LLC (to include the following related entities: HMRF Fund I, LLC and HMRF Fund II, LLC)
- Justice Funds/Justicefunds, LLC
- Ludus Capital, LLC
- Peachtree Funding Northeast, LLC/Settlement Funding, LLC (to include the following related entities: Peachtree Settlement Funding, LLC, Peachtree Originations, LLC, Peachtree Financial Solutions, LLC, Peach Holdings, LLC, PeachHI, LLC, Orchard Acquisition Co. LLC, JGWPT Holdings, LLC, JGWPT Holdings, Inc., J.G. Wentworth, LLC, J.G. Wentworth S.S.C. Limited Partnership, J.G. Wentworth Structured Settlement Funding II, LLC, and Structures Receivables Finance #4, LLC)
- Pravati Legal Funding/Pravati Capital, LLC
- RD Legal Funding, LLC (to include the following related entities: RD Legal Finance, LLC, and RD Legal Funding Partners, LP)

- Thrivest Specialty Funding, LLC
- Top Notch Funding/Top Notch Lawsuit Loans/Top Notch Funding II, LLC
- Walker Preston Capital Holdings, LLC
- Case Strategies Group (formerly, NFL Case Consulting, LLC)
- Legacy Pro Sports, LLC

RESPONSE: 0

4. Of the total number of Settlement Class Members included in your answer(s) to question #2, how many of these Settlement Class Members have also entered into the Assignments referenced in question #3?

RESPONSE: 0

5. Are you, your law firm or any attorney associated with your law firm obligated to pay or forward (directly or indirectly) any portion of a Settlement Class Member's Monetary Award to any third party litigation funder?

RESPONSE: NO

6. Explain any other role that you, your law firm, or any attorney associated with your law firm may have had in creating, promoting, or facilitating the Assignments referenced in question #3 and/or the obligations referenced in question #5.

RESPONSE: NOT APPLICABLE

7. Do you, your law firm, any attorney associated with your law firm or any individual or entity related to your law firm have any direct or indirect (professional or

personal) association with any of the third party litigation funders used by Settlement Class Members previously or currently represented by you, your law firm or any attorney associated with your law firm? If so, provide details of that association. If any of these individuals and/or entities had such an association in the past, provide details of that association. If any of these individuals and/or entities anticipates having such an association in the future, provide details of that association.

RESPONSE: NO

8. Have any of the Assignments referenced in question #3 been resolved in accordance with the rescission process provided for in ECF No. 9517? If so, indicate those that have been resolved by their designated letter (*See* “Documents,” below) and the date of the resolution.

RESPONSE: NOT APPLICABLE

9. Attach true and correct copies of the following documents to the declaration:

- A. Any Assignments referenced in question #3;
- B. Any collateral documents to the Assignments referenced in subsection (A), including, but not limited to:
 - i. Any documents creating, or relating to, any of the obligations referenced in question #5;

ii. Any documents relating to an Assignment referenced in question #3 where you, your law firm or any attorney associated with your law firm is named or is a signatory; and/or

iii. Any other documents related to an Assignment referenced in question #3 that are in your, your law firm, or any attorney associated with your law firm's possession, custody or control.

C. All versions and drafts of the documents described in subsections (A)-(B) and all such documents entered into or proposed, even if such documents have been terminated or replaced by subsequent documents.

D. All written communications regarding any of the documents described in subsections (A)-(C) between any third party litigation funder and you, your law firm, or any attorney associated with your law firm.

RESPONSE TO A-D: NOT APPLICABLE

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of April, 2018.

A handwritten signature in black ink, appearing to read 'Samuel Issacharoff', is written over a horizontal line.

SAMUEL ISSACHAROFF

CERTIFICATE OF SERVICE

I, Christopher A. Seeger, hereby certify that a true and correct copy of the foregoing Declaration of Samuel Issacharoff was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: April 30, 2018

Respectfully submitted,

/s/ Christopher A. Seeger
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